



**THE CITY OF NEW YORK  
LAW DEPARTMENT**

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March 10, 2025

**Via ECF**

Honorable Mary Kay Vyskocil  
United States District Court for the  
Southern District of New York  
500 Pearl Street, Courtroom 18C  
New York, NY 10007

**Re: Joseph Reiver v. The City of New York  
Case. No. 25-cv-01376 (MKV) | Letter Re: Extension of Time to Respond to  
Complaint**

Dear Judge Vyskocil:

I am an Assistant Corporation Counsel in the Office of MURIEL GOODE-TRUFANT, Corporation Counsel of the City of New York, attorney for Defendant The City of New York in the above-entitled action.

I write pursuant to Rule 2(G) of the Court's Individual Rules of Practice in Civil Cases to respectfully request an extension of time to respond to the Complaint until either 30 days after a decision is rendered on any motion for a preliminary injunction or until May 12, 2025 (60 days after Defendant's response to the Complaint is due). Defendant's response to the Complaint is due on March 13, 2025. This is Defendant's first request for an extension of time to respond to the Complaint. Plaintiff's counsel will not consent unless Defendant will grant his request for a temporary restraining order ("TRO").

Additional time to respond to the Complaint is needed because I was just assigned this matter and need to dedicate time and resources to responding to Plaintiff's request for a TRO by March 12, 2025 and preparing for the March 19, 2025 appearance on the TRO.

Respectfully submitted,

Genan F. Zilkha  
Assistant Corporation Counsel

cc: All Counsel of Record (via ECF)